


BellSouth Telecommunications, Inc.

333 Commerce Street
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Nashville, TN 37201-3300

guy.hicks@bellsouth.com

June 19, 2000

 **BELLSOUTH**
REC'D IN
REGULATORY AUTH.

JUN 19 4 07 PM '00
Guy M. Hicks
General Counsel

OFFICE OF THE
EXECUTIVE SECRETARY
615-214-6301
Fax 615-214-7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*
Docket No. 99-00948

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s First Interrogatories to Intermedia Communications, Inc. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,


Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*

Docket No. 99-00948

BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST INTERROGATORIES TO INTERMEDIA COMMUNICATIONS, INC.

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests Intermedia Communications, Inc. ("Intermedia") to provide answers in response to the following Interrogatories within fifteen (15) days of service hereon, or by July 5, 2000.

INSTRUCTIONS

(1) If any response required by way of answer to these Interrogatories is considered to contain confidential or protected information, please furnish this information subject to the protective order entered in this proceeding.

(2) If any response required by way of answer to these Interrogatories is withheld under a claim of privilege, please identify the privilege asserted and describe the basis for such assertion.

(3) These Interrogatories are to be answered with reference to all information in your possession, custody or control or reasonably available to you.

(4) If any Interrogatory cannot be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of an

Interrogatory, answer all parts of the Interrogatory to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

(5) These Interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these Interrogatories subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(1) "Intermedia" means Intermedia Communications, Inc., any predecessors in interest, its parent, subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Intermedia.

(2) "You" and "your" refer to Intermedia.

(3) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(4) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(5) "Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the

communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

(6) “Arbitration Petition” refers to the petition filed by BellSouth on December 7, 1999, requesting arbitration under Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (“Act”).

(7) “Incumbent Local Exchange Carrier” refers to the term as defined in Section 251(h) of the Act, as codified in 47 U.S.C. § 251(h).

INTERROGATORIES

1. Identify all persons participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith.

2. Identify each person whom you expect to call as an expert witness at the arbitration hearing. With respect to each such expert, please state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion.

3. Identify each person whom you have consulted as an expert in anticipation of this arbitration or in preparation for a hearing in this arbitration who is not expected to be called as a witness. With respect to each such expert, please state the facts known by and opinions held by this expert concerning any matters raised in the Arbitration Petition.

4. Identify all documents which refer or relate to any issues raised in the Arbitration Petition that were provided or made available to any expert identified in response to Interrogatory Nos. 2 or 3.

5. Identify all documents upon which Intermedia intends to rely or introduce into evidence at the hearing on this matter.

6. State the recurring and nonrecurring rates you contend BellSouth should charge in Tennessee for the frame relay elements necessary to provide packet-switch services, including the User-to-End Network Interface, Network-to-Network Interface, and the Data Link Control Identifiers and Committed Information Rates. In answering this Interrogatory, describe with particularity the method by which these rates were calculated.

7. Identify all studies, evaluations, reports, or analyses prepared by or for Intermedia since January 1, 1996 that refer or relate to the cost to BellSouth or any other Incumbent Local Exchange Carrier of providing any of the unbundled network elements or other services requested by Intermedia in its Arbitration Petition.

8. Identify all states in which Intermedia is providing local exchange service and identify the number of access lines being served by Intermedia in each such state.

9. Identify all agreements between Intermedia and an Incumbent Local Exchange Carrier under Section 252 of the Act, whether the agreement was entered into through voluntary negotiation or compulsory arbitration. In answering this request:

(a) identify the Incumbent Local Exchange Carrier that is a party to each such agreement;

(b) state the effective date of each such agreement; and

(c) state the expiration date of each such agreement.

10. Identify any and all cost studies, evaluations, reports or analyses prepared by or for Intermedia concerning any issue raised by Intermedia in this Arbitration.

11. Identify with specificity all functions performed by Intermedia's switch that Intermedia contends are tandem switching functions.

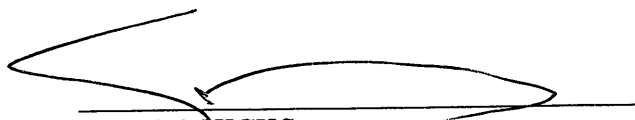
12. Identify the location of each of Intermedia's end users in relation to Intermedia's switch(es).

13. Does Intermedia have any proposed TELRIC cost studies for establishing prices for the new UNEs in the FCC's *UNE Remand Order*? If the answer is in the affirmative, identify each such cost study.

14. Does Intermedia have any proposed rates for the new UNEs in the FCC's *UNE Remand Order*? If the answer is in the affirmative, identify each such rate.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



GUY M. HICKS

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(615) 214-6301

R. DOUGLAS LACKEY
A. LANGLEY KITCHINGS
675 West Peachtree Street, N.E.
Suite 4300
Atlanta, Georgia 30375

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand
☐ Mail
☐ Facsimile
☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

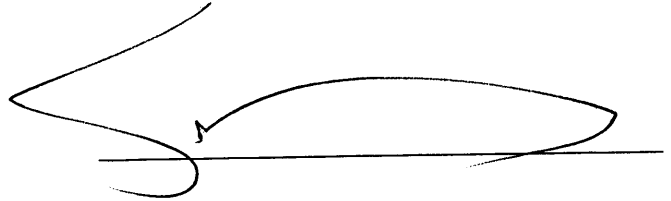
Carl Jackson, Senior Director
Intermedia Communications, Inc.
360 Interstate North Parkway, Suite 500
Atlanta, GA 30339

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Scott Saperstein
Senior Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line and a small flourish at the end.